

ALEX G. TSE (CABN 152348)
United States Attorney

BARBARA J. VALLIERE (DCBN 439353)
Chief, Criminal Division

KATHERINE L. WAWRZYNIAK (CABN 252751)
Assistant United States Attorney

450 Golden Gate Avenue, Box 36055
San Francisco, California 94102-3495
Telephone: (415) 436-7317
FAX: (415) 436-7234
katherine.wawrzyniak@usdoj.gov

Attorneys for United States of America

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

UNITED STATES OF AMERICA,)	No. CR 18-0541 JST
)	
Plaintiff,)	STIPULATION AND PROPOSED
)	ORDER CONTINUING MATTER AND
v.)	EXCLUDING TIME UNDER THE
)	SPEEDY TRIAL ACT
CARLOS MARTINEZ-PAREDES,)	
)	Date: November 30, 2018 to January 4, 2019
Defendant.)	Time: 9:30 a.m.
_____)

The parties appeared before the Honorable Jon S. Tigar on November 30, 2018, for an initial status conference. At the parties' joint request, the matter was continued to January 4, 2018, at 9:30 a.m. for change of plea.

The government stated that it has produced the discovery in the case. Defense counsel is reviewing that discovery and will be unavailable for part of December. Therefore the parties stipulated, and the Court ordered, that time between November 30, 2018 and January 4, 2019, be excluded for effective preparation of counsel and continuity of counsel, pursuant to 18 U.S.C. § 3161(h)(7)(B)(iv).

//

//

1 The parties further stipulate, and ask the Court to find, that the requested continuance and
2 exclusion of time are in the interests of justice and outweigh the best interest of the public and the
3 defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A).

4 SO STIPULATED.

5 DATED: November 30, 2018

ALEX G. TSE
United States Attorney

/s/

KATHERINE L. WAWRZYNIAK
Assistant United States Attorney

9 DATED: November 30, 2018

/s/

DAVID RIZK
Counsel for Defendant Martinez-Paredes

12 For the reasons stated, this matter is continued until January 4, 2019, at 9:30 a.m. The time
13 between November 30, 2018 and January 4, 2019, is excluded from the running of the speedy trial clock
14 for effective preparation and continuity of counsel under 18 U.S.C. § 3161(h)(7)(B)(iv). Failure to grant
15 the continuance would deny the defendant's counsel the reasonable time necessary to prepare and deny
16 defendant continuity of counsel.

17 IT IS SO ORDERED.

19 DATED: December 3, 2018


HONORABLE JON S. TIGAR
United States District Judge

22 Attestation of Filer

23 In addition to myself, the other signatory to this document is David Rizk. I attest that I have his
24 permission to enter a conformed signature on his behalf and to file the document.

25 DATED: November 30, 2018

/s/

KATHERINE L. WAWRZYNIAK
Assistant United States Attorney